

# Amphenol

an LPL company

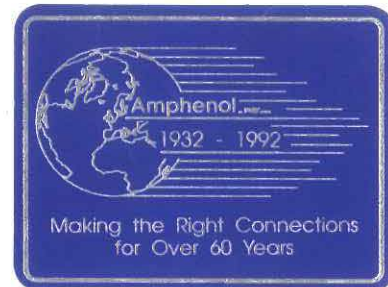
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OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Amphenol Corporation

Corporate Headquarters  
358 Hall Avenue  
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Wallingford, CT 06492-7530  
Telephone (203) 265-8900



September 2, 1992

IND 044 587 848

Mr. William Buller  
U.S.EPA-Region V, 5HR-12  
230 Dearborn Street  
Chicago, IL 60604

D.2.1

Dear Mr. Buller:

I understand from recent conversations with Susan Gard and Jim Keith that there is some residual concern on your part regarding the necessity for an NPDES application for groundwater infiltration into the storm sewer at the former Amphenol/Bendix facility in Franklin, IN. The Consent Order requires that an application be submitted within 30 days of notice from IDEM that such is required.

This issue was discussed at some length at our February 18, 1988 meeting in Chicago with EPA. At that time I indicated that, while I didn't believe an application was necessary or appropriate, I would follow up with IDEM to confirm that viewpoint. Those conversations resulted in revised consent order language being proposed, in my March 3, 1988 letter, which is currently reflected in the final order (an additional sentence was added to the end of the subject Interim Measure later in our negotiations).

I have confirmed IDEM's requirements for NPDES applications in a September 1, 1992 telephone conversation with Joe Krieger, IDEM Permits Supervisor. An NPPES permit is required for all indirect or direct point source discharges into surface waters of the state. He confirmed that groundwater infiltration into a storm sewer is not a point source. He further noted that a permit could not be issued for a condition "in violation of surface water quality standards," and that treatment of the noncompliant condition would be required before a permit to discharge could be issued; this last point is clearly the reason the additional sentence was placed in the Interim Measures clause of the Consent Order.

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Mr. Krieger indicated that if a remedial system were installed which discharged to the storm sewer, a permit would be required. Until that time, no permit is necessary.

Please don't hesitate to contact me if you have any questions regarding the above.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel S. Waldo".

Samuel S. Waldo  
Director, Environmental Affairs

lmc:buller-wp

c: S. Gard  
J. Keith